

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 12 1987

SUBJECT: Removal Request for I.J. Recycling, Fort Wayne, Indiana
(Site Spill ID# Q7) - ACTION MEMORANDUM

FROM: Kenneth Theisen, On-Scene Coordinator
Emergency Response Section

K M Theisen

EPA Region 5 Records Ctr.



224018

TO: Valdas V. Adamkus
Regional Administrator

THRU: Basil G. Constantelos, Director
Waste Management Division

E. Timothy Oppelt

PURPOSE

The purpose of this memorandum is to obtain your approval to expend up to \$1,565,000, which will fund Phase II of the I.J. Recycling site cleanup in Fort Wayne, Indiana. Phase I, initiated with your concurrence on November 3, 1986 (see Attachment I), was completed in early December 1986, and involved the characterization and stabilization of the site. This proposed action will address the sampling, bulking, transportation and the disposal of the various chemicals. These include 3,023 drums and 60 storage tanks ranging in size from 500 to 20,000 gallons. Also included will be stack sampling, creek sediment sampling, decontamination of the various buildings and a general site cleanup. This action is considered a restart. The site is not on the National Priorities List (NPL).

BACKGROUND

The I.J. Recycling facility is at 3651 Clinton Street, Allen County, Fort Wayne, Indiana. It consists of three buildings and a tank farm (see attachment II). The site is surrounded by small businesses, residences and the Glenbrook Mall, the largest in Indiana. A complete history of this facility can be found in the original action memorandum dated November 3, 1986 (Attachment I).

The United States Environmental Protection Agency (U.S. EPA) Emergency Response Section (ERS) first became involved with this facility in February 1985 when a site inspection was done at the request of the Small Business Administration. No imminent threat was determined to exist then, although various safety recommendations were made.

The ERS re-entered the matter in January 1986, when a spill involving hazardous ink solvents occurred. Approximately 1,500 gallons of the liquid entered a storm drain, which emptied into a ditch that leads to the St. Joseph River. Although most of this material was recovered in the ditch, some did enter the river. This also is covered in Attachment I.

On September 23, 1986, the U.S. EPA ERS responded to an appeal by the mayor of Fort Wayne and conducted another site assessment. This

request was based on a recent fire at the facility and the overall deteriorated nature of the plant. The City also obtained a restraining order against the facility, preventing it from operating. The inspection uncovered many serious problems which prompted the removal action.

This began November 3, 1986, and continued until December 2, 1986. During the action, more than 3,000 drums were characterized and moved to a heated secured building (see site map) awaiting disposal of this material under Phase II. Site security is ongoing.

THREAT

The I.J. Recycling facility poses the following actual or potential threats to human health and the environment as delineated within Section 300.65(b)(2) of the National Contingency Plan (NCP).

- a) Potential exposure of hazardous substances by people, animals or food chain.
- b) Potential contamination of drinking water or other sensitive ecosystems.
- c) Hazardous substances in drums and tanks that may pose a threat of release.
- d) Threat of fire or explosion.

The above threats are documented by analysis done on a few, randomly selected drums and tanks. Results show hazardous materials including: phenol, diethyl phthalate, methyl phenol, toluene, xylene, tetrachloroethylene and bromoform, a class B poison.

Approximately 150 "over pack" drums were used in November's site stabilization to secure leaky drums. However, many more of the 3,000 drums on-site are of questionable structural integrity and even though temporarily secure, disposal must occur soon, especially since some drums may have deteriorated further and begun leaking.

ENFORCEMENT

Notification was made and a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 106 Administrative Order was issued to present owners and/or operators for the Phase I stabilization. No commitment was made by the present owners and/or operators to do the work. A responsible party search was conducted to uncover other generators. There are potentially several hundred responsible parties, including the U.S. EPA.

An additional Section 106 Administrative Order will be issued to the present owners and/or operators for this Phase II action. A refusal to do the work as outlined in this memorandum will result in the Emergency Response Section undertaking this removal action.

PROJECT AND COST

The objective of this action is to sample, transport and dispose of the

contents of more than 3,000 drums and 60 above-ground tanks, which were temporarily secured in a Phase I action begun in November 1986. Some off-site sampling is anticipated, and several smoke stack samples will be taken.

Decontamination of the buildings on-site and a site cleanup of drums, tanks and other debris also is included. The estimated costs for this action follow:

EXTRAMURAL COSTS

Cleanup Contractor	\$1,272,000
Contingency (15%)	<u>191,000</u>
Subtotal	\$1,463,000
TAT	\$ 25,000
Contingency (15%)	<u>4,000</u>
Subtotal	\$ 29,000
Total Extramural	\$1,492,000

INTRAMURAL COSTS

EPA Direct Costs (800 hrs. x \$30 per hr.)	\$ 24,000
EPA Indirect Costs (800 hrs x \$61 per hr.)	<u>49,000</u>
Total Intramural	\$ 73,000

TOTAL PROJECT \$1,565,000

A more detailed breakdown of costs can be found in Attachment III.

This action, by eliminating the potential for further releases and abating the threats to public health and the environment, would contribute to the efficient performance of long-term remedial actions.

REGIONAL RECOMMENDATION

Because conditions at the I.J. Recycling facility meet the NCP §300.65 criteria for removal action, I recommend you approve this expenditure by signing below. The estimated costs are \$1,565,000, of which \$1,492,000 are extramural cleanup contractor costs.

APPROVAL: *for* *Frank M. Conway*

REGIONAL ADMINISTRATOR

DATE: 8-13-87

DISAPPROVE: _____

DATE: _____

REGIONAL ADMINISTRATOR

ATTACHMENT III

PHASE II - Transportation and Disposal

EXTRAMURAL COSTS

A. Sample drums, tanks and disposal of contents

1) Personnel	\$ 67,000
2) Equipment	19,000
3) Materials	31,000
4) Analytical	7,000
5) Transportation	46,000
6) Disposal	<u>953,000</u>
Subtotal	\$1,123,000

B. Disposal of piping, tanks and drums

1) Personnel	\$ 31,000
2) Equipment	7,000
3) Materials	3,000
4) Transportation	1,000
5) Analytical	1,000
6) Disposal	<u>23,000</u>
Subtotal	\$ 66,000

C. Stack and creek sampling and general site cleanup

1) Personnel	\$ 6,000
2) Equipment	1,000
3) Materials	1,000
4) Analytical	33,000
5) Transportation	1,000
6) Disposal	<u>2,000</u>
Subtotal	\$ 44,000

D. Support Items 39,000

Subtotal	\$1,272,000
Contingency (15%)	<u>191,000</u>
	\$1,463,000

ATTACHMENT IV

Cumulative Costs Summary

	<u>11/3/86 Action Memo</u>	<u>This Action Memo (restart)</u>	<u>Removal Actions Total for Site</u>
Cleanup Contractor	\$ 317,600	\$ 1,272,000	
Contingency	<u>47,600</u>	<u>191,000</u>	
Subtotal	\$ 365,200	\$ 1,463,000	\$ 1,828,200
TAT	\$ 16,000	\$ 25,000	
Contingency	<u>2,400</u>	<u>4,000</u>	
Subtotal	\$ 18,400	\$ 29,000	\$ 47,400
Extramural Total	\$ 383,600	\$ 1,492,000	\$ 1,875,600
EPA Direct	\$ 6,000	\$ 24,000	
EPA Indirect	<u>4,300</u>	<u>49,000</u>	
Intramural Total	\$ 10,300	\$ 73,000	\$ 83,300
Project Total	\$ 399,000	\$ 1,565,000	\$ 1,958,900